

IT IS FURTHER ORDERED THAT, the Clerk is directed upon notice from the United States Attorney's Office to remove the docket papers hereby impounded and restore the same to the public docket.

BY THE COURT:

A handwritten signature in black ink, reading "Lynne A. Sitarski". The signature is written in a cursive, flowing style. The first name "Lynne" is written with a large, looped capital "L". The middle initial "A." is written in a smaller, simpler script. The last name "Sitarski" is written with a capital "S" and a trailing flourish.

HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

 v. :

CERTAIN PERSONS :

CRIMINAL NO.

MOTION TO IMPOUND INDICTMENT

The United States of America, by and through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Timothy M. Stengel and Danielle S. Bateman, Assistant United States Attorneys for the District, moves to impound the within documents and in support of its Motion states as follows:

1. The within Indictment, and accompanying docket papers, are documents which, if made public would jeopardize the government's interest in protecting ongoing criminal investigation and protecting against the risk of the defendant's fleeing prior to arrest in this matter.
2. Although the public has a common law right of access to judicial proceedings and papers, matters relating to protecting an ongoing criminal investigation and protecting against the defendant's fleeing prior to arrest, are traditionally conducted ex parte and in camera, with deference to the government's determination that the Indictment should be sealed.
3. Accordingly, balancing the public's right of access to judicial documents with the government's interest in not jeopardizing ongoing criminal investigation and in protecting against the risk of the defendant's fleeing prior to arrest in this matter, the government

respectfully requests that the government's Motion be GRANTED. The government further requests that the Clerk of Court be directed to make no public docket entry of the sealed documents and motion and order to seal, and to provide copies of all sealed documents only to Timothy M. Stengel, Assistant United States Attorney. It is further requested that the Indictment shall be unimpounded upon notice of the United States Attorney that the case no longer needs to remain sealed.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

s/ Timothy M. Stengel
TIMOTHY M. STENGEL
DANIELLE S. BATEMAN
Assistant United States Attorneys